

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Shakiyla Carter Individually and as Plaintiff	:	CIVIL ACTION
as Personal Representative/ Administrator of the Estate of Richard Carter, deceased,	:	
Plaintiff	:	NO. 1:23-cv-01867-KM-DFB
	:	
v.	:	JURY TRIAL DEMANDED
Dauphin County d/b/a Dauphin County Prison, et.al., Defendants	:	
	:	

**Defendants, Dauphin County d/b/a Dauphin County Prison, and Tsaurayi Deredza's Motion for Leave to Depose a Prisoner Pursuant to Federal Rule of Civil Procedure 30(a)(2)(B)**

Defendants, Dauphin County d/b/a Dauphin County Prison, and Tsaurayi Deredza, by and through their attorneys, Lavery Law, hereby file this Motion for Leave to Depose a Prisoner pursuant to Rule 30(a)(2) of the Federal Rules of Civil Procedure and state the following in support:

1. Rule 30(a)(2)(B) of the Federal Rules of Civil Procedure requires that a party obtains leave of court before taking the deposition of a person confined in prison.
2. Gregory Woods is presently incarcerated at Dauphin County Prison located at 501 Mall Road, Harrisburg, PA 17111.

3. Gregory Woods is a fact witness who was incarcerated and housed in M-Block at the Dauphin County Prison during the same time that Plaintiff Decedent Richard Carter was incarcerated and housed in M-Block from December 20, 2022, until Richard Carter's death on December 24, 2022.

4. Allowing the deposition of Gregory Woods, will provide Defendants, Dauphin County d/b/a Dauphin County Prison, and Tsaurayi Deredza, with the opportunity to gain additional information from Gregory Woods pertaining to the allegations set forth in Plaintiff's Third Amended Complaint, and to assess his credibility and trustworthiness in the event this matter proceeds to trial.

For the reasons stated above, Defendants, Dauphin County d/b/a Dauphin County Prison, and Tsaurayi Deredza, respectfully request this Honorable Court grant their Motion for Leave to Depose a Prisoner, pursuant to Rule 30(a)(2)(B) of the Federal Rules of Civil Procedure and enter the accompanying Court Order.

Respectfully submitted,

**Lavery Law**

By: /s/ Andrew W. Norfleet

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DATE: August 15, 2025

*County d/b/a Dauphin County Prison,  
and Tsaurayi Deredza*

**CERTIFICATE OF SERVICE**

I, Cathleen A. Sheaffer, an employee with the law firm of Lavery Law, certify that on this 15<sup>th</sup> day of August, 2025, I served a correct copy of the foregoing Motion via ECF to counsel of record:

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